

The new emerging East Devon Local Plan – Designated Neighbourhood Area Housing Requirement Discussion Session

7pm Thursday 15th June 2022

Q & A Notes

Emerging Local Plan Presentation

Question: Do we - or how do we - take account of the highest grade agricultural land in deciding where to put development?

Answer: We have policies in both the adopted and emerging Local Plan that seek to protect higher grade agricultural land (Grades 1, 2 and 3a) from development. One of the challenges is that about two-thirds of the district is covered by Area of Outstanding Natural Beauty designation and about the one-third that isn't tends to contain the higher grade agricultural land. Certainly we try to avoid development of higher grade agricultural land, particularly where that is being farmed for food production but that is not always possible given the other constraints in our district.

Question: What can we do to make developers build the right type of houses that we need in our communities, particularly affordable homes for our younger generation, and is it realistic for us to be able to deliver the level of affordable homes that we are currently working to in the emerging local plan?

Answer: East Devon District council has lobbied the Government, most likely along with many other Local Authorities, for better provision of affordable housing. The figure in the emerging local plan includes affordable houses already committed to be developed through existing permissions but nevertheless it will be a challenge to deliver those numbers within the plan period because of the context of operating within the limits of current government policy and also regarding site viability. Developers have to work to viability constraints: clearly they have costs and they need to turn a profit. We can push for more affordable housing, but it is not a money maker for developers. It has to also be recognised that market housing is a deliverer of affordable housing so we need to look at total housing provision and also understand the nuances of particular local needs that we can see if we can try to address.

Question: What, if any, exceptional circumstances could the District Council raise with Government to justify not providing for the housing requirement figure from the standard methodology? Can the extent of the AONBs and the infrastructure constraints in those areas that are not covered by AONB designations be used as reasons?

Answer: A case to Government could include our Areas of Outstanding Natural Beauty designations and the landscape impact that might be associated with development here and our undeveloped coastline, our nature and biodiversity designations and possibly also infrastructure issues, for example, highway issues may also be of such a scale as to justify lower levels of development. We accept that infrastructure capacity (e.g. roads, schools, health services) is a big constraint in some parts of the district. It is ultimately a decision by members as to whether we (or the extent to which we) might want to promote sites in the AONB and if we do, we will need to be very mindful of the impact. Nevertheless it is an option which could be explored further, particularly on the edge of the towns and we do have sites in some of those locations that we could look at again.

Overall, we would stress that East Devon is not really unique in the country in facing these types of constraints and issues and that these need wider answers to address them. It is uncertain / unlikely even that we could argue or justify having

exceptional circumstances that the government would accept on that basis. It would really need to be justification that sets East Devon apart from most other places. We will however be picking up those issues in a report that we will be taking to Strategic Planning Committee that they have asked for in order to re-look at this issue in more detail and enable all members to have an informed debate on this issue and how we take it forward.

Question: How can it be fair that most of the development has to go in the third of the district outside of the AONB? Given our population doubled the average growth rate for the UK in the last 10 years putting us in the top 5% of districts out of 390 in the country, perhaps this could potentially make us exceptional, particularly if you then add in the 65% of our area covered by AONB, and the climate emergency which surely should carry significant weight. Can this be tested with Government as a potential exceptional circumstance even if other counties and districts are going to be saying similar, as residents are very concerned about the levels of development envisaged?

Answer: We do understand the concerns and it's not necessarily an unwillingness to challenge but we need to be sure that we can make a robust case that's going to be listened to. What we don't want to do is to put forward a case that really has no chance of being successful and potentially spend a lot of time and resource progressing a Local Plan only for it to be found unsound at examination and find we are back to 'square one'. In the meantime the Government may be introducing a revised planning system with a new plan making process and we really would have to start again. There are a lot of risks associated with challenging the numbers and there are implications in the meantime of us not having a five-year housing land supply, and not having an up to date strategy in place, so we do need to balance all these issues and hopefully this is the debate we can have at Strategic Planning Committee in the near future and Members can bear in mind the concerns that have been raised in response to the local plan consultation.

Question: What is the further consultation likely to be about in 2023 on the emerging local plan and what form will it take?

Answer: The shape of consultation is still to be determined. Along with the topic of this webinar on designated neighbourhood area housing requirement figures which will be the subject of further consultation still to be planned, other topics where we need to do further work include green wedges, areas of open space and recreation, employment sites.

Question: When will this Local Plan actually be implemented?

Answer: Inevitably this will depend on how quickly the process moves and when we have a degree of certainty and confidence in where the government might be going in both respect to NPPF changes and the Planning and Levelling Up Bill. Announcements on the NPPF were due in the Spring and we are now expecting steers on those to come through over the coming months. There is likely to be 2 to 3 years minimum time before we get to when the Plan might be adopted, but of course there can be all sorts of complications as things progress, so there is an element of the unknown but we are keen to pursue the plan in a timely manner.

Question: Bearing in mind that we might be asked to take housing need from others if they can successfully demonstrate that they cannot meet their own needs, if we are looking to promote our own exceptional circumstances and that is unsuccessful, what is the likelihood we will have to try and meet other areas unmet housing need?

Answer: Yes this is another challenge. We obviously have these problems meeting our own housing need and other authorities are finding the same challenges. For example, Torbay have been clear with us they do not think they can meet their housing need and they are expecting help from those other authorities including East Devon that fall within the Exeter Housing Market Area. We need to work through those issues under a framework called the 'Duty to Cooperate' which is embedded in the legislation to order to try and find a way through that. Currently our response to Torbay has been one of 'prove your case to us' because there is not a great deal of evidence behind that at the moment and we need to understand the position more clearly. If we are struggling to meet our own need, we are clearly going to really struggle

to also meet anyone else's. There could be some decisions to be made by Strategic Planning Committee in the coming months as to how we address those issues as for our own plan to be found 'sound' we must engage in dialogue with the other authorities under the 'Duty to Cooperate'.

Designated Neighbourhood Areas (DNA) Housing Requirement (HR)

Question: Bearing this in mind, should groups be getting on with their neighbourhood plan preparation now?

Answer: There is a challenge in that if you are progressing a plan now it will need to demonstrate general conformity with the adopted Local Plan and if you get to a position where you are submitting your plan after the new Local Plan comes through that you will be 'out of sync'. Therefore there is some benefit in potentially waiting to see a bit more what happens with the new Local Plan as that progresses to ensure that you are in step with the emerging strategy/policy on the district wide basis. Ultimately the decision whether to progress a neighbourhood plan and the timing of it is one for the local people of the area in question and the neighbourhood planning groups and this may depend on the specific circumstances in your area and how progressed you already are with a neighbourhood plan. (n.b. **It is also the most recently adopted plan that takes precedence, but also if waiting, be aware there could be further delays to the new Local Plan timetable.**)

Question: Do Neighbourhood Planning Groups need to wait for the designated neighbourhood area housing requirement figures to be set before progressing their plans? Indicative numbers sooner rather than later would be helpful to help communities decide whether or not to prepare a NP...

Answer: We can give indicative numbers for NPs at this current stage to 2031 only. However, because the current Local Plan was prepared before these provisions that we are discussing came into effect, it does not make provision for calculating these figures and works on the assumption that they will be zero for all of our DNAs so that anything that

comes forward through a neighbourhood plan is additional. We may need to look further at this and how other LPAs approach it. (Please note at the current time, it is not considered that we can give meaningful indicative figures up to 2040 as this would pre-empt the Local Plan work on housing requirements for designated neighbourhood areas, for which we are yet to agree a methodology, and also pre-judges the scale of housing in the Local Plan area and the spatial strategy/distribution of housing. NPGs can (exceptionally) justify their own housing requirement figure according to PPG, but need to be mindful that the LP is at an early stage of plan making, and much may change.

Question: What can NP groups do if we disagree with the sites in our area proposed in the emerging local plan? Can we propose that the new homes go in other locations in our area?

Answer: There are a lot of sites currently rejected by our Officers in their assessments so far that could be reconsidered. Nothing has been decided yet in terms of which sites will be brought forward - that is also subject to further discussion by our Members which will be informed by further work and the views of the community and others to inform the debate going forward.

Question: As it is possible under national planning guidance for a neighbourhood plan to promote alternative sites to local plan sites as long as those sites aren't strategic sites, have you given any consideration as to which sites are strategic sites/locations, for example which relate to the overall plan strategy as opposed to allowing for smaller sites to come forward through the neighbourhood plan route as alternatives to Local Plan allocations?

Answer: NPPF allows Local Plans to allocate sites in strategic and non-strategic policies. The Local Plan must include strategic policies to address the LPA's priorities for the development and use of land in its area. Currently all allocation sites in the emerging Local Plan are within strategic policies. But nothing has been decided yet in terms of which sites will be brought forward. We can also consider further whether it is appropriate for the Local Plan to classify its allocations as 'strategic' or 'not strategic' sites. For example, will this help to support delivery of the Local Plan's vision, objectives and strategy, and if so how to justify such classification. Neighbourhood plans can only allocate sites in non-strategic policies. Under NPPF, neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies. PPG on Neighbourhood Planning is clear that a neighbourhood plan should not be used to constrain the delivery of a strategic site allocated for development in the local plan, but it allows a

neighbourhood plan to propose allocating alternative sites to those in a local plan where those alternative proposals in the neighbourhood plan are 'not strategic' (with provisos).

To be consistent with NPPF AND PPGs, we will therefore need to be clear about these two concepts:

- a) Strategic and non-strategic policies, and;
- b) Strategic and not strategic sites

There may be guidance in PPGs or elsewhere about what are 'strategic' or 'not strategic' sites. We will need to do some further research to provide greater clarity on this. If neighbourhood plans are proposing alternative sites the onus is on them to provide the evidence to justify those sites. As it says in the PPG, there needs to be engagement between the qualifying body (i.e. the neighbourhood plan group) and the LPA to look at why the qualifying body considers the allocations set out in the strategic policies are no longer appropriate. Suggested that the Strategic Environmental Assessment and other evidence (e.g. viability assessment) may help to assess alternative sites and to explain why allocations in strategic policies are no longer appropriate.

Question: Given very few neighbourhood plans have allocated land as the housing requirement was met previously entirely through Local Plan allocations and looking at the sites that are being taken forward through the emerging local plan now, are there any advantages in neighbourhood plans designating land, particularly as none of the sites are particularly popular, there would be an awful lot of work to be done? If we do, what support will there be particularly in terms of the evidence?

Answer: This is one of the big challenges in producing a neighbourhood plan which often relies on volunteer time. It is certainly challenging for neighbourhood plan groups to bring forward sites. Clearly we have more resources at the District Council to do that and gather the necessary evidence. We also have limited resources to support neighbourhood plan groups across the district - we have our full-time neighbourhood planning officer but if more groups wanted to go down this route we might have to look at how we resource that more fully than we already are, which is something else our Members may also have to consider. At the moment we are just looking at the appetite to do this but we agree it would be quite a burden on neighbourhood plan groups to do more of this and could be quite resource intensive. **Note:** There are Government grants and funded technical support available via Locality: [Home - Locality Neighbourhood Planning](#)

Question: Is there adequate time for NP groups to be looking at site allocation in the context of the emerging Local Plan, especially where they have not got previous experience in this area?

Answer: Yes we would accept this and obviously different neighbourhood plans are at different stages - some have been made recently, others several years ago, and some may still be at an early stage of production so there are different starting points, and different levels of experience. It would perhaps be difficult to have a uniform approach across the district but that is what we really need to have if we go more down the route of neighbourhood plans making allocations as part of meeting the district housing requirement. We consider it likely that we would need to have some sort of consensus and a uniform approach, otherwise it would become potentially quite challenging at local plan examination.

Question: Where there is a 'made' neighbourhood plan that had a supporting housing needs survey, if this no longer carries sufficient weight and we cannot alter the quantum of new houses we are going to be expected to take, would it strengthen our position if we did a new housing needs survey to help inform the types of houses we get (affordable houses, smaller homes etc.)? And more generally, will neighbourhood plan policies about types of housing have influence in order to give communities the houses that they need?

Answer: Whether we could factor in the existing housing needs survey would depend on how old that is as to whether it is still valid but certainly neighbourhood plans can have policies about the types of housing that you want to see. Having an up-to-date housing needs assessment or survey could certainly help in understanding what the needs are in an area and informing any neighbourhood plan preparation but really it's about timing of when you do that survey work for it to inform the plan and make sure that it provides up-to-date evidence when you're taking a plan forward.

Generally, local Housing Needs Surveys informing neighbourhood plan policy can only help in terms of achieving the right type of housing for a community. The local plan is allocating sites in our communities but is seeking to meet district needs, so if there are particular needs for particular types of housing in different communities it would be useful to bring through policies in a neighbourhood plan as to what type that should be that would supplement the policies in the Local Plan and add specificity.

Question: In an area classed as open countryside in planning terms if a housing needs surveys is done for a community and suggests for example, the need for three to four homes, will this be taken into account in the Local Plan housing figures?

Answer: The Local Plan is trying to meet the district housing requirement and as part of this, there also needs to be a housing requirement figure set for each Designated Neighbourhood Area. There is a timing consideration here as we are currently trying to work out an appropriate method to calculate housing requirement figures for neighbourhood areas and what's included in those. We will consult on options for how to calculate those DNA requirement figures. We will need to consider whether and how to take account of forecast supply sources, including existing and emerging neighbourhood plan allocations and windfall sites. We will need to avoid double counting. Smaller sites that you might be considering for allocation might otherwise potentially come forward as windfalls and be covered by that allowance. Be mindful that some small affordable housing could come forward in the countryside on Rural Exception sites. Usually these are 'windfalls' (i.e. not allocated), although there are a few site-specific allocations of Rural Exception sites in Neighbourhood Plans.

A housing needs survey e.g. of a parish is a study of a small area. Such studies impartially and objectively assesses a small area's local housing need. They supports feasibility studies and development proposals e.g. in a Neighbourhood Plan. However, using this type of study as evidence may be tricky when we justify Local Plan policy housing requirements for all designated neighbourhood areas. Not all DNAs have up to date housing needs surveys. The surveys may use different models, source data, assumptions, and forecasts. If we rely on such surveys this could result in the method we use to justify DNA housing requirements being perceived as inconsistent across the District and not aligned to the overall Local Plan requirement or the underlying forecast of the district local housing need. This could lead to challenge and delay if we have to find a more robust method if the policy is to be found sound

Question: Can local or neighbourhood plan policy be used to avoid a proliferation of second homes by insisting that homes be primary residences only?

Answer: This would be more challenging. We do not have any policies at present (n.b. the made Sidmouth NP does include a policy to preclude second homes on any 'exception site' schemes). Although this has been introduced in some

other parts of the south west (in Cornwall and the South Hams) where it is a particular problem, the difficulty is in evidencing that it is a sufficient problem to justify it, such as the community closing down in the winter time or justification through house price inflation. In areas where it has been introduced, the issue is far greater (for example 30% of homes are second homes in St Ives) and if the level was, for example, something more like 5%, this would not succeed.

Question: If in setting the housing requirement you would consider updated and emerging new neighbourhood plan allocations as 'windfalls' does this give us any protection or will you just add to it through Local Plan allocations? The incentive for communities to make allocations if this was taken off their housing requirement figure is clear, but if they are only counted as additional numbers, is there any point? Likely that many plans have not made allocations because that is the most difficult and challenging part of neighbourhood plan preparation, but if a community has made the effort they will feel that should be recognised in the Local Plan process?

Answer: Understand the point and would advise that this is all part of the discussion and consultation to come on the method options for how we calculate the DNA HR figures. We should also clarify that 'made' neighbourhood plan allocations are part of the development plan for their area and therefore are not windfalls. NPPF defines windfalls as sites not specifically identified in the development plan. The question is more about emerging or updated neighbourhood plans in terms of at what point in the process of their preparation can we be confident that there is sufficient certainty that we could rely on those figures in the production of the Local Plan and justification of its policies So it's whether they are seen as an additional supply of housing over and above housing supply sources we can rely on for the local plan calculations or within the total that we need to evidence delivery of. We need to be mindful that these are likely to be challenged at the Regulation 19 Publication plan stage and expect that they will be tested very vigorously at Local Plan examination.

Question: In respect of Strategy 1 of the emerging local plan which sets out the settlement hierarchy and then classes places outside those named settlements as 'open countryside', is the approach the same as in the adopted Local Plan where those areas without a built-up area boundary would have a presumption against development?

Answer: We would stress that the current approach in the adopted Local Plan is not a moratorium on development outside Built-Up Area Boundaries in .The adopted Local Plan policy allows for neighbourhood plans to introduce settlement boundaries and for neighbourhood plans or community land trusts to bring forward Rural Exception sites, for instance. The Plan makes it clear those areas classed as open countryside are not suitable locations for general market housing - they need to be community led schemes to meet the needs of the particular community. Be mindful however that some housing development occurs in the countryside through the 'prior approval' mechanism via Use Class Q development. Decisions are still to be made on all aspects of the emerging Plan policy including the overall spatial strategy. The Reg. 18 draft Local Plan has policies on Rural Exception Sites and First Homes Exception sites, as well as policy about housing for rural workers, and the strategic policy on development beyond settlement boundaries..

Question: Mindful of the limited capacity and professional planning knowledge in NP groups, the very different circumstances in different areas where NP work exists, and the complexity of the topic, can this be kept as simple as possible and agree that the approach would need to be the same across all of the parishes for consistency and to avoid over-burdening NP groups and the NP process? Also need to be mindful that there can be enough difficulty in preparing a neighbourhood plan and getting agreement between the local planning authority and the local community about what development is appropriate locally and that this will add extra complexity and challenge, particularly in explaining and consulting on the concept of Designated Neighbourhood Area Housing Requirement figures through any public consultation, and that even if the neighbourhood plan group and the local planning authority are in agreement, a neighbourhood plan could still be rejected by the community at referendum if they do not understand the point in respect of the designated neighbourhood area housing requirement.

Answer: Agree. Will try to keep it as straightforward as possible but accept it is going to be challenging to do a consultation with people that have had far less experience than those attending the webinar to give comments in an informed way. We will have to give some very careful thought as to how we engage wider on these issues and we would be interested to hear your thoughts on this.

Question: Has the need to look at setting DNA HR come about because we have a shortfall in our five year housing land supply and had to think quite laterally about ways to bridge that gap, and that if we do not go down the neighbourhood plan allocations route, is the alternative that we have to go back trying to find more sites to allocate in the Local Plan. If we were to ask the community to identify sites through a NP process, but not be able to give guarantees that they would get the accessible and affordable housing that they need, it would appear to be a very difficult sell.....

Answer: We are not doing this work because of our 5 year housing land supply, we are doing this simply because it is now Government policy that we have to set a housing requirement for all of our Designated Neighbourhood Areas in strategic policy in the Local Plan. It's then really a choice as to what extent the obligation falls to neighbourhood plans to allocate sites and to what extent we do that through the local plan. We understand it is difficult and challenging for neighbourhood plans to bring forward those sites and to get local buy-in, partly because of the work involved, but there are communities that want to see growth and development and want to see new housing to meet their needs. Whatever happens about the HR figure for DNAs, there is the opportunity through neighbourhood plans to allocate sites or at the very least have policies that seek to secure the types of housing you want on the sites that are coming forward through other means.

Additional Q&A Post Webinar

Question: What is the relevance of the figure of 20,800 housing requirement (18,920 plus 10%) in the context of the discussion on Designated Neighbourhood Area Housing Requirement?

Answer: The 20,800 figure is directly relevant to Neighbourhood Planning, because it is the scale of total housing supply that needs to be identified as forecast to be delivered in East Devon in the plan period 2020 to 2040, sufficient to meet local housing need AND demonstrate supply 'flexibility' to manage future uncertainty. If we can evidence that scale of delivery, it helps EDDC to show that Strategic Policy 3 (the housing provision requirement) is justified and deliverable, and is consistent with NPPF (3 of the 4 tests of soundness which the policy must pass if the policy is to be found 'sound'). If we don't provide adequate justification and Strategic Policy 3 is not found sound then undoubtedly the LP Inspector would find that the plan's strategy and objectives could not be achieved. This would then have a very high risk of the inspector recommending that the Council withdraws the plan (i.e. we would have to start plan-making from the beginning again). That would mean there would be no up to date local plan for new or updated neighbourhood plans to be in general conformity with. Nor would there be any Designated Neighbourhood Area housing requirement figures in the LP's strategic policy (although EDDC could continue to provide 'indicative' figures in the context of the currently adopted Local Plan).

Question: What is the relevance of 910 new homes per annum, down from 946?

Answer: The 910 dwellings per annum (dpa) figure would be relevant for LP Strategic Policy 3 as plan making progresses. The figure comes from applying the Government's Standard Method using the latest data supplied by the Office for National Statistics in March 2023 (on house prices and wages). The 910 dpa figure post-dates preparation of the Reg 18 draft Local Plan (which used the 946 dpa rate). It is therefore the latest data and the Council will need to consider the implications of this new data for the emerging Local Plan. The 910 dpa would be one piece of evidence to inform our justification of the emerging Strategic Policy 3 (along with many other evidence considerations) going forward. We have a lot of work on sites and housing supply (and other evidence) to complete before we could justify a revised LP housing requirement number in Strategic Policy 3, and a related housing supply to meet that requirement and demonstrate supply flexibility (i.e. the 10% supply headroom). So the 910 dpa would become relevant to Neighbourhood planning as it would impact on the emerging LP District housing requirement and the scale of total housing supply that needs to be identified as forecast to be delivered in East Devon in the plan period 2020 to 2040 (see the first answer above). But please note - the ONS updates the data annually, so the Local Housing Need figure may change again in the future.

In terms of decisions on planning applications, and implementation of your NP, please note that because our adopted Local Plan is more than 5 years old, we have to use the latest 'local housing need' number (i.e. the 910 pa) for Development Management purposes as well as in the 2023 Housing Monitoring Update calculation of the 5 year housing land supply position. I mentioned in my initial reply that this work is in progress. Please note I am advised that there is still significant work to complete before we are ready to report on this to Strategic Planning Committee later this year.

Question: How is / is infrastructure capacity taken into consideration?

Answer: Firstly to note that infrastructure is not taken into account when the scale of Local Housing Need is calculated. Current Government policy and guidance is clear: housing need is 'unconstrained'. However, constraints (e.g. environment and infrastructure) should be considered once a housing need figure has been identified. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a total housing requirement figure and preparing policies to address this, such as site allocations.

However, infrastructure is taken into account in justifying LP allocations; the amount of housing supply that is forecast to be delivered and; justifying Policy 3 housing provision requirement (i.e. whether the policy is deliverable). We will be considering a range of matters, including infrastructure, development viability, impact on the environment, communities and the economy etc., when we revisit local plan policies and site allocation proposals as plan making progresses. This may impact on the amount of housing supply forecast for delivery in the plan period. This could be relevant for housing requirement figure for Designated Neighbourhood Areas, depending on the methodology for calculating those housing requirements (which supply sources are included). Furthermore, if the constraints mean that the district supply we identify is less than need, then this means we are saying we have insufficient supply capacity and therefore have 'unmet need'. This raises 'Duty to Co-operate' issues with other neighbouring authorities about how that unmet need is to be addressed and where it would be accommodated. We wait to see what any revised national planning policy and/or guidance says on this matter....

Please note, on 9 June 2023 the Council's Strategic Planning Committee resolved to receive a detailed report outlining the risks associated with trying to present a case that there are fundamental constraints in a local planning authority area such that the required numbers cannot be acceptably accommodated and the options that the Committee may take on board when considering appropriate housing need. There is no set date for this but it was requested 'asap' and is a current priority. I shall be letting all Clerks and NP contacts know when this report is available as I know it will be of great interest to all.

To delve deeper, there is a published technical evidence document available on our website but it is lengthy and technical:- [Housing Need, Supply and Requirement Interim Topic Paper November 2022](#) (Please note it is an interim paper which does not yet cover the housing requirements for Designated Neighbourhood Areas but will be updated in due course.)

Question: In terms of speculative planning applications for sites identified in the emerging new Local Plan, if any of these are accepted for development before the new local plan is adopted, do they count towards our HR number or will they be “windfall sites”?

Answer: If speculative applications have been granted consent before we set a cut-off date for the HR calculations, they would be reasonably likely to be included in your figures as 'commitments' (assuming we include commitments within the HR calculation). Speculative planning applications if granted later would count as windfalls so would also potentially count against your figures. It will however depend on the final method chosen for calculating the HR for our neighbourhood areas and what is included in that, which will be the subject of further consultation so a definitive answer cannot be given at this stage.

Question: Do the residents preferred sites trump the EDDC preferred sites and if not why not?”

Answer: There is still more work to be done on site selection and the current work Officers are doing is looking at all the feedback on sites that came through the Local Plan consultation comments (from the community/residents and others). So the proposed sites are subject to change at this stage. Ultimately going forward, if there are disagreements on sites between what EDDC is proposing to take forward in the LP and what the community prefers, it will be tested further through the independent examination on the LP but this will be focusing fundamentally on whether the plan is 'sound' (meets all the tests of soundness including is the plan effective (i.e. deliverable). If NPs wish to propose alternative sites is something we touched on in the webinar and agreed needed more investigation into the reading of Government policy and guidance on this in terms of whether sites are strategic and not.